

# **EXHIBIT D**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**LAURA FAUGHT and STEVEN  
FAUGHT, on behalf of themselves and  
all others similarly situated,**

**Plaintiffs,**

**v.**

**AMERICAN HOME SHIELD  
CORPORATION,**

**Defendant.**

**Case No.: 2:07-CV-1928-RDP**


**DECLARATION OF LYNN SCHROEDER**

1. My name is Lynn Schroeder. I am over twenty-one years of age, am of sound mind, and am competent to give this declaration. This declaration is based upon my personal knowledge, and is offered in support of the class action settlement pending before the Court in the above-styled case.
2. I am employed by American Home Shield Corporation ("AHS") as Manager of the Claims Management and Resolution Department. In that capacity, I will be in charge of setting up and having general oversight over the Review Desk that is proposed under the settlement.
3. Assuming the settlement is finally approved, and after the Effective Date of the settlement, AHS will establish and operate the Review Desk in keeping with the terms of the Stipulation of Settlement. AHS will in that regard consider a submission made by any class member concerning that class member's denied claim (meaning either outright denial by AHS, or receipt of cash from AHS in lieu of repair or replacement services that the settlement class member deemed to be inadequate), if that denied claim occurred between July 24, 2001 and October 20, 2009.
4. AHS will, assuming the settlement is finally approved, notify settlement class members via postcard of the date when the Review Desk will begin receiving settlement class member submissions, including the date by which submissions must be postmarked or emailed in order to be considered by AHS.

5. AHS will staff the Review Desk with customer service associates who have at least three years' experience, and who will be specially trained to address Review Desk submissions. The Review Desk will review all timely submissions made to it.
6. AHS will communicate in writing or by email with every settlement class member whose submission has been pending for 90 days, which communication will include the current status of the submission as well as an estimated timeframe when AHS expects to make a decision on the submission. In all events, AHS commits to processing and responding to all submissions within the time frame required under the Stipulation of Settlement.
7. I expect that establishing and operating the Review Desk will involve a substantial commitment of AHS's time and resources. Doing so will involve, among other things, training of existing and potentially future employees, developing and implementing processes for dealing with telephone and call flows, preparation of potentially vast amounts of correspondence from settlement class members, significant amounts of research regarding what may well be very old files, and preparation and maintenance of extensive logs. AHS anticipates submissions from settlement class members in volumes greatly exceeding the company's normal levels of claims and inquiries from customers.
8. I am aware of the items of information listed on the Claim Submission Form which AHS will be receiving from settlement class members who make submissions to the Review Desk. These are (in summary): name; current address; telephone number; email address if any; preferred method for receiving communications from AHS; the AHS contract number (if available); the address of the property covered by the Home Service Contract; the description of the item at issue; the approximate date (at a minimum the year) of the settlement class member's initial request for service relating to the denied claim; description of the service request and denied claim; and reasons the settlement class member believes the denied claim should be reviewed and overturned or revised. The settlement class members are also entitled to submit additional information if they choose, and the Claim Submission Form provides examples of other types of information the settlement class member might wish to submit.
9. The information requested in the Claim Submission Form is necessary for AHS to be able to identify the settlement class member and his or her denied claim, as well as for AHS to be able to communicate with the settlement class member about it. Information such as name, covered address and which claim the submission involves is necessary because, among other reasons, the settlement class member may have had multiple Home Service Contracts with AHS, and may well have had multiple past claims. In any event, AHS will not reject a submission outright for lack of the required information, but will endeavor, based on the information it is provided and attempted contact with the settlement class member, to determine what the submission is requesting so that AHS can process and consider it.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated February 25, 2010.

  
Lynn Schroeder